

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

|                                    |   |                              |
|------------------------------------|---|------------------------------|
| <b>TYLER RAY SCHRIBER,</b>         | ) |                              |
| <b>Plaintiff</b>                   | ) |                              |
|                                    | ) |                              |
| <b>v.</b>                          | ) | <b>CAUSE NO. 2:25-CV-532</b> |
|                                    | ) |                              |
| <b>DEPUTY ALEX SLIGER, et al.,</b> | ) |                              |
| <b>Defendants</b>                  | ) |                              |

**MOTION TO DISMISS AMENDED COMPLAINT**

Come now Defendants Alex Sliger, Austin Farrell, Nicole Dornon, Robert Loop, Jeffrey Clark, and Robert Goldsmith and submit their Motion to Dismiss Plaintiff's Amended Complaint under Trial Rule 12(b)(6) and, in support thereof, state as follows:

1. Plaintiff Tyler Schriber filed his Amended Complaint against the Defendants on March 12, 2026.
2. Defendants Sliger, Farrell, Dornon, and Loop are Tippecanoe County Sheriff's Deputies. Defendant Clark is an investigator for the Tippecanoe County Prosecutor. Defendant Goldsmith is the Sheriff of Tippecanoe County.
3. Mr. Schriber was residing at 1932 Vinton Street in Lafayette, Indiana in the early hours of June 5, 2025, when Deputies Farrell, Dornon, and Loop rang the front door bell. Another deputy, Alex Sliger, was posted in the back with his K9, along the fence line and near the garage. The officers were searching for Tanner Clugh, an individual suspected of auto theft, criminal confinement, strangulation, and domestic battery.
4. When officers made their presence known in the front, Plaintiff went out the back door into the yard while another resident answered the front door. As Mr. Schriber

- approached the back yard fence line, Deputy Sliger announced his presence and ordered Mr. Schriber to stop. In response, Mr. Schriber ran away from Deputy Sliger, through the backyard, into the front yard, and down Vinton Street.
5. Deputy Sliger and his K9, Csupak, went back around the house to the front to pursue the fleeing individual. Deputy Sliger deployed Csupak and they were joined by some of the officers from the front.
  6. After a “friendly fire” engagement by Csupak with one of the officers, Deputy Sliger disengaged the dog from the officer and redirected him toward Mr. Schriber. Mr. Schriber was bitten by Csupak before being arrested by the officers.
  7. Plaintiff claims that the presence of the officers at Vinton Street in their various locations constituted an illegal search within the curtilage and, additionally, that Detective Sliger should have recognized that he was not Mr. Clugh and, as such, the use of a K9 to apprehend him was inappropriate and his arrest was unjustified.
  8. Mr. Schriber further claims that the incident reports concerning his arrest were misleading or false and, as such, Defendant Clark’s affidavit using the reports in support of criminal charges filed by the Prosecutor was wrongfully presented to the state court and did not support his continued detention. Sheriff Goldsmith is sued in his official capacity for federal *Monell* claims.
  9. Even accepting Mr. Schriber’s allegations as true, his Complaint fails to state a claim against the Defendants. Their presence at Vinton Street was lawful and did not constitute a search within the meaning of the Fourth Amendment.
  10. Information the police had as to the whereabouts of Mr. Clugh coupled with Mr. Schriber’s suspicious departure out the back when police knocked on the front door

gave police reasonable suspicion to detain Mr. Schriber. When he fled from the police after they announced themselves, the deputies had probable cause to arrest him.

Given the circumstances, the use of a K9 to apprehend the fleeing subject was reasonable. The state law claims fail, primarily due to law enforcement and other immunities available under the Indiana Tort Claims Act.

11. Mr. Schriber has failed to state a claim for which relief may be granted. A Memorandum of Law which addresses the claims in detail is submitted herewith and made part hereof.

12. Pursuant to Fed. R. Evid. 201(b)(2), the Defendants request that the Court take judicial notice of the map of 1942 Vinton Street available through Google Maps and attached as Exhibit A to the Memorandum of Law. Defendants further request the Court take judicial notice of the records in the criminal proceedings against the Plaintiff under Cause 79D07-2509-CM-1681, specifically the affidavit of probable cause and related police reports filed on September 2, 2025.

WHEREFORE, the Defendants request that the claims against them be dismissed for failure to state a claim and for all other appropriate relief.

HOFFMAN, LUHMAN & MASSON, PC

By: /s/Douglas J. Masson  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Additionally, the document was served on the same date via U.S. mail, first-class postage prepaid, addressed to:

Tyler Schriber  
1932 Vinton Street  
Lafayette, IN 47904

/s/Douglas J. Masson